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*Attorneys for Defendants*  
*PROGRESSIVE WEST INSURANCE COMPANY,*  
*UNITED FINANCIAL CASUALTY COMPANY, and*  
*PROGRESSIVE SELECT INSURANCE COMPANY*

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

SHONDRA MORRISSETTE, BRIDGETTE  
DAWSON, and SAMUEL MARTINEZ on behalf  
of themselves and all others similarly situated,

Plaintiffs,

v.

PROGRESSIVE WEST INSURANCE  
COMPANY, a foreign insurance company,  
UNITED FINANCIAL CASUALTY  
COMPANY, a foreign insurance company, and  
PROGRESSIVE SELECT INSURANCE  
COMPANY, a foreign insurance company,

Defendants.

) Case No. 4:19-cv-07239-JST

) **STIPULATION TO FURTHER EXTEND**  
) **DEADLINE TO FILE RESPONSIVE**  
) **PLEADINGS**

1 Under Local Rule 6-1(a), the parties stipulate to further extend the time within which Defendants  
2 may file a responsive pleading to Plaintiffs' Complaint.

3 On November 1, 2019, Plaintiffs filed their Class Action Complaint in the United States District  
4 Court for the Northern District of California. ECF No. 1. On November 5, 2019, Plaintiffs personally  
5 served Defendants with the Summons and Class Action Complaint. ECF Nos. 10-12. Accordingly, the  
6 deadline for Defendants to file responsive pleadings was originally November 26, 2019. Fed. R. Civ. P.  
7 12(a)(1)(A)(i).

8 Plaintiffs agreed to extend Defendants' deadline to file and serve their responsive to January 3,  
9 2020, while Defendants' analyzed Plaintiffs' allegations and formulated a response. On December 6,  
10 2019, Defendants informed Plaintiffs' counsel that it had uncovered potentially fatal issues to the  
11 adequacy of the Named Plaintiffs and subsequently provided supporting information and data in  
12 response to questions from Plaintiffs' counsel. On December 19, 2019, Plaintiffs' counsel indicated that  
13 they intend to amend their complaint to substitute some of the Named Plaintiffs. Plaintiffs' counsel has  
14 represented that they are working on the amended complaint but do not expect to file their amended  
15 complaint before January 3, 2020. Plaintiffs, therefore, have agreed to extend Defendants' deadline to  
16 file and serve their responsive pleadings to on or before 30 days after Plaintiffs have filed their amended  
17 pleading.

18 **IT IS HEREBY STIPULATED AND AGREED**, under Local Rule 6-1(a), that the deadline for  
19 Defendants to file their responsive pleadings shall be extended to on or before 30 days after Plaintiffs  
20 have filed their amended pleading.

1 DATED: December 31, 2019  
2  
3

4 By: /s/ Annick M. Persinger  
5 Annick M. Persinger (SBN 272996)  
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*Attorneys for Plaintiffs*

13 DATED: December 31, 2019  
14  
15

16 By: /s/ Traci L. Shafroth  
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*Attorneys for Progressive West Insurance  
Company, United Financial Casualty  
Company, and Progressive Select Insurance  
Company*

24 **ATTESTATION**

25 I, Traci L. Shafroth, am the ECF User whose identification and password are being used to file  
26 this document. In compliance with Local Rule 5-1(i)(3), I hereby attest that counsel for Plaintiffs concur  
27 in this filing.  
28

DATED: December 31, 2019

By: /s/ Traci L. Shafroth  
Traci L. Shafroth

**CERTIFICATE OF SERVICE**

This Certificate of Service is made in compliance with Local Rule 5.1.2 and Civ.R. 5(b). I am employed in the County of San Francisco, State of California. I am over the age of 18 and not a party to the within action. My business address is 201 Mission Street, Suite 2310, San Francisco, CA 94105.

On the date indicated below, a true and correct copy of the foregoing STIPULATION TO FURTHER EXTEND DEADLINE TO FILE RESPONSIVE PLEADINGS was filed with the Court and served electronically and will be available for viewing and downloading from the Court's CM/ECF system:

The Notice of Electronic Case Filing automatically generated by the system and sent to all parties entitled to service under the Federal Rules of Civil Procedure and the Local Rules of the Northern District of California who have consented to electronic service shall constitute service of the filed document to all such parties.

I declare under penalty of perjury that I am employed in the office of a member admitted to practice before the District Court for the Northern District of California and ECF registered in this Court at whose direction the service was made and that the foregoing is true and correct. Executed on, December 31, 2019, at San Francisco, California.

By: /s/ Diana Bennett  
Diana Bennett